Cassiar Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Cassiar Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Cassiar Timber Supply Area

Background

As part of the review of timber supply in the Cassiar Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Cassiar TSA *Data Package* and *Information Report* in November 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Cassiar TSA. A 30-day review period, ending December 31, 1999, was provided for the public to comment on these documents.

On March 13, 2001, the British Columbia Forest Service released the *2001 Cassiar Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 80-day review period that ended May 31, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Cassiar TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Bulkley/Cassiar Forest District office.

Public Review Process and Response

Cassiar District staff actively solicited public input on the Timber Supply Review in the Cassiar TSA through the following actions:

- approximately 250 copies of the *Information Report, Data Package, Public Discussion Paper* and *Analysis Report* were mailed to stakeholders in the TSA and around the province, such as First Nations, licensees, environmental groups and local governments. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at the Bulkley/Cassiar district office in Smithers, the Prince Rupert regional office in Smithers, and the field office in Dease Lake. Approximately 10 copies were picked up. The documents were also available on the Ministry of Forests website.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. One interview was conducted with CBC radio.
- open houses on the *Analysis Report* were held in Iskut, Dease Lake and Telegraph Creek on April 17th and 18th, 2001, (17 participants) and in Atlin on May 18th, 2001, (one participant).
- presentations on the *Analysis Report* were made to representatives from Lower Post and Good Hope Lake on March 13th, 2001.

The Cassiar Forest District received 19 written submissions on the *Data Package* and 14 submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Cassiar TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

A submission from Cassiar Forest Watch questions what scale maps were used to identify operable areas, while Skeena Cellulose questions the exclusion of areas with slopes greater than 35 per cent. The company says in adjacent TSAs ground-based harvesting is common on slopes well over 35 per cent.

Skeena Cellulose questions the economic feasibility of harvesting stands with less than 150 cubic metres per hectare. The company says that in most areas of the province, harvesting is marginal under 200 cubic metres per hectare.

Skeena Cellulose also says the netdowns for roads, trails and landings are based on 1994 figures, prior to implementation of the Forest Practices Code, and need to be reviewed.

Three submissions ask various questions about the application of Environmentally Sensitive Areas (ESAs), including:

- are the 39 forest cover maps with ESA designations representative of all 1181 forest cover maps in the TSA?
- why has there been no new mapping of ESAs since 1994?
- why are there no ESAs for wildlife that result in a reduction in harvesting?
- where is the data to support the statement that most Es2 areas (with sensitive soils) are harvestable and treatable with past silviculture practices?

The Canadian Parks and Wilderness Society – Yukon Chapter (CPWS) states their support for the completion of a protected areas network, including special management zones, in northern BC and the Yukon. The society says it's premature to assess available timber supply until these areas and other conservation needs are identified in the transboundary region, and provides a list of areas of interest.

Expected Rate of Growth

An individual submission asks for the rationale for not adjusting operational adjustment factors (OAFs) to reflect northern growing conditions.

Forest Cover Requirements

Cassiar Forest Watch says they have not seen the scientific basis for achieving forest cover requirements with low biodiversity forest areas, noting that a high biodiversity-low elevation corridor also meets required interior forest conditions.

Skeena Cellulose says areas classified as non-commercial cover should contribute to forest cover requirements, as do non-forest areas. The company notes the "aggregate" method of harvesting practiced in the Bulkley TSA, saying this may allow a smaller number of passes with larger openings to achieve patch size and seral stage distributions.

Visually Sensitive Areas

Skeena Cellulose says it's inappropriate to limit economic opportunities by creating a 500-metre no-harvest buffer on either side of Hwy 37. The company says this is the most accessible and most operable timber in the TSA, and notes that in other TSAs visually sensitive areas are managed not removed from the timber harvesting land base. An individual submission says the buffer along Hwy 37 is important but needs to be

flexible to achieve visual quality objectives.

The same individual says this protection is also important along waterways with tourism and recreation values, while another submission questions who determined that no visual quality objectives need to be established for areas in the Cassiar, as stated in the *Data Package*. Cassiar Forest Watch says a critical analysis is needed based on the direction for roads and rivers from the Cassiar-Iskut-Stikine Land and Resource Management Plan (LRMP).

Riparian Management

Skeena Cellulose says there is an error in the reductions applied to riparian reserve zones alongside small streams, and an adjustment is needed.

An individual questions the methodology used to establish riparian zones and says provisions are needed for possible reductions to the timber harvesting land base pending completion of the stream inventory. Adjustments are also needed to protect oolichan, according to this submission.

Cassiar Forest Watch states their disagreement with the lack of any netdown in riparian management zones.

Wildlife Management

One individual expresses concern about the impact of increased road access on wildlife, and the consequences for guide-outfitters. Another says it's unacceptable that no land base adjustments for wildlife habitat are planned. A third submission says lumping grizzly bear and goat habitat needs together is puzzling and asks if the guidelines apply only to the Interior Cedar-Hemlock Zone. Cassiar Forest Watch notes that a great deal of isolated, high-value wildlife habitat doesn't show on broad scale maps.

Caribou Management

One submission says that after 30 years of guide-outfitting in the Spatsizi area and having participated in two major caribou studies, they're able to see the need for vast areas to meet the wintering needs of caribou and to avoid predators. This submission compliments the Ministry of Forests for recognizing the importance of forests for wildlife (in the LRMP process) and supporting "no logging zones" in areas of high ecological values.

Another individual says the description of threatened species fails to include caribou which are arguably more threatened by logging than any of the other species mentioned. Specific concerns about wildlife habitat areas (WHAs) for caribou include ensuring:

- the minimum percentage of area in stands older than 140 years;
- minimizing fragmentation of habitat;
- connectivity between seasonal ranges; and
- the ability of soils to regenerate lichen growth.

Biodiversity

An individual expresses the opinion that there is an opportunity in the Cassiar, where the forest industry is not entrenched, to make maintenance of biodiversity and the integrity of indigenous ecosystems a cornerstone of forest management. This submission says it is dangerous to assume objectives for non-timber values can be achieved outside the timber harvesting land base, because much of the harvesting will occur in the biologically rich river valleys or in pine forests that are important habitat.

Cassiar Forest Watch says wildlife tree patches (WTPs) plus forest cover requirements do not fully address landscape biodiversity issues. Of particular concern is the need to maintain the interior conditions of forests; this submission suggests a reduction in the timber harvesting land base to ensure the widths necessary to preserve interior forest species and connectivity.

An individual expresses concern about the assumption that WTP requirements can be met, at least in part, by riparian habitat areas and other non-timber harvesting land base areas. This submission points out that non-colonial bird species generally space themselves territorially and restricting pairs to confined areas is unlikely to maintain populations.

Heritage Resources

One individual says it's objectionable there will be no adjustments for cultural heritage resources, including traplines and the Telegraph Trail. Two submissions note the designation of the Stikine River as a heritage river, and one suggests logging near it should be deferred until management guidelines are completed.

Unsalvaged Losses

An individual says that considering natural agents such as pests, fire and wind as "losses" is an example of management thinking geared solely to human economic benefits.

Cassiar-Iskut-Stikine LRMP

Five submissions comment on the work of the Cassiar-Iskut-Stikine LRMP. Three say this work should take precedence over and be completed prior to the Timber Supply Review. Of particular concern are candidate protected areas, according to two submissions.

First Nations

One individual asks how is it possible to reconcile industrial resource extraction while the Tahltan aboriginal question remains outstanding. Four submissions say there was a lack of proper and meaningful consultation with First Nations.

The ShaKlink Family of the Tahltan Nation says the Timber Supply Review process contravenes domestic and international law, and the Ministry of Forests and the Tahltan Nation must become partners in determining any AAC in their territory.

The Teslin Tlingit Council asserts aboriginal title over a portion of the land in the TSA and is in land claims negotiations. The Council says the Ministry of Forests neglected to include them in its consultation strategy and urges the ministry to begin the process of properly and meaningfully consulting.

The Carcross/Tagish First Nation says Yukon First Nations with transboundary traditional territories were not consulted appropriately and fairly, and the timing and timelines of the public input period were a problem. The lack of an LRMP to oversee the Timber Supply Review and balance other values is also a concern, according to this submission.

Socio-Economic Factors

Seven submissions comment on the socio-economic factors considered in the Timber Supply Review. The main comments include:

- tourism provides substantially more economic benefit to the region than forestry does, and will continue to do so.
- the protection of biodiversity and the region's wildlife/wilderness values has more potential social and economic benefits than can be derived from timber.
- the local needs and opportunities identified in the LRMP should be the basis for decision-making.
- priority should be given to a small-scale, locally-beneficial forest industry that processes wood in the region, and not to maximizing fibre supply to southern mills.
- industrial scale harvesting is not the best option, and has been a hard sell with the community compared to mining, trapping, tourism, guide-outfitting, and road construction and service jobs.
- wood from the Cassiar TSA is important to mills in adjacent TSAs.

Timber Supply Area Analysis Report

Land Base Factors

The Tahltan Land Use Office (the Tahltans) says most of the remaining operable timber is fragmented and an economic analysis is needed with respect to accessing these timber "islands" before deciding whether to include or exclude them from the timber harvesting land base.

The Tahltans question the exclusion of pulp quality stands based on a lack of harvesting history, and provide examples of harvesting in similar stands in recent years. This submission says the Tahltans would like management rights over these stands if they're not included in the timber harvesting land base, as well as an area-based tenure covering the Iskut and Boundary Supply Block and other areas of traditional territories.

BC Spaces for Nature (BC Spaces) notes an apparent contradiction in the *Analysis Report* where it says the total timber harvesting land base impact of the LRMP is one per cent, yet also states there will be a one per cent land base reduction for both WTPs and riparian protection. BC Spaces also expresses support for deferring the Klappan watershed under Part 13 of the *Forest Act*.

Biodiversity and Wildlife

An individual submission says the management direction for grizzlies and caribou developed by the LRMP table should be applied to the entire Cassiar TSA.

BC Spaces says the assumption that forests outside the timber harvesting land base can meet most biodiversity objectives is flawed, for the following reasons:

- wildlife habitat occurs in and out of the timber harvesting land base, and relying on non-timber harvesting land base forests to provide habitat is unlikely to maintain critical habitat inside the timber harvesting land base.
- the timber harvesting land base is concentrated in individual valleys and liquidating the commercial forest in a specific valley could have ecological consequences.

Fire Losses

The CPWS says the methodology used to estimate annual losses to forest fires is flawed; the Forest Service must take a more accurate measurement and adjust the AAC accordingly.

Cassiar Watch also says the analysis fails to account adequately for re-occurring natural wildfire and provides details of projections they have made based on the actual volume of timber that burnt during a recent 25-year period on the Iskut Supply Block harvesting land base.

BC Spaces outlines two concerns with the methodology used to estimate fire losses:

- no estimate was made of the frequency of catastrophic fires.
- it's inaccurate to assume the area burned on the timber harvesting land base has the same volume of timber as forest burned outside the timber harvesting land base; this approach underestimates fire losses.
- BC Spaces proposes an alternative approach.

Partition

The regional district director for Area D expresses concern that the entire AAC not come from the Iskut and Boundary Supply Block. He is also concerned that adequate land use planning and inventory have still not been done for the Dease/Liard and Atlin blocks, and the opportunity for local benefits and capacity-building has not yet developed there.

Cassiar Watch says the living timber supply from the Iskut Supply block has been greatly overestimated while fire salvage potential has been underestimated. The group recommends a

low area-based AAC for the Iskut block, and a focus on additional fire salvage harvesting and on non-timber forest outputs.

Socio-Economic Factors

Five submissions comment on socio-economic factors relating to the Timber Supply Review. The main comments include:

- the socio-economic considerations and objectives are well-considered.
- the *Socio-Economic Analysis (SEA)* overestimates the forest sector's regional economic importance. E.g., employment numbers include Cassiar residents who work in neighbouring TSAs, leading to an overstatement of the Cassiar forest sector's contribution to the local economy.
- it's important to consider the growing tourism industry (including guide-outfitting), its socio-economic impacts and how it's affected by increasing the AAC.
- high subsidies and/or raw log exports would be required to support an increased harvest, and these would negate other socio-economic benefits.
- there are no studies that calculate the overlap between tourism and the timber harvesting land base to confirm the chief forester's contention of coexistence.
- increased costs are not considered in the *SEA* (e.g., fire suppression, administration).
- calculations of future revenues to the province are severely flawed. E.g., the anticipated forest licence in the Iskut has a stumpage of 25 cents per cubic metre compared to the average $35.69 per cubic metre used in the *SEA*.
- the LRMP requires that benefits from forestry should accrue to local communities. The assumption that residents could get about 20 per cent of the direct employment from a fully-utilized AAC is inadequate.
- all LRMP references to forestry stress small-scale and local need. There is no mandate to initiate large-scale commercial logging that exports timber from the region or province.

Cassiar Watch says most of the current locally-driven Iskut Valley forest economy occurs in the early seral forests of the valley's burns. Examples are provided of economic activities based on the fire cycle, ranging from fire fighting to mushroom and berry picking and salvage of fire-killed timber.

Other Comments

Most submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Nine submissions comment on the Timber Supply Review process. The major points include:

- the shortage of data in this TSA must be addressed.
- the time allowed and timeline for review of the *Data Package* are a problem (just prior to Christmas season). The data gaps in the document are noted.
- the process appears to be very thorough.
- the analysis is a great improvement over 1996 but the approach is inherently flawed. It's designed to determine how much timber can be cut without weighing timber values against other forest values. The *Analysis Report* reads as though timber is the primary value in this TSA.
- the assumptions fall short of objectivity and science, and pave the way for an increase in timber supply and AAC.
- the Timber Supply Review should be approached at a community-forest level.
- various local initiatives arising from the

LRMP must be completed before setting an AAC.

Harvest Levels

Many submissions commented on the harvest level for the Cassiar TSA:

- the AAC for the Atlin area should remain the same.
- 400,000 cubic metres per year is adequate for the short term, given unproven regeneration rates, wildlife needs, market demands and benefits of the undeveloped wilderness sector.
- any AAC above 125,000-150,000 cubic metres and for regional use is not justifiable. Cassiar is renowned for values other than timber; why jeopardize them with roads and clearcuts for the marginal gains from harvesting slow-growing boreal timber.
- given downward pressures and uncertainty about fire history, an AAC between 64,000 and 140,000 cubic metres would best reflect an ecologically sustainable AAC.
- the AAC should be reduced significantly or to zero as the potential costs to biodiversity and wilderness-based tourism exceed the marginal benefits to local economic development. More roadbuilding will dissect one of the last unroaded areas of the world, increasing environmental risks.
- the AAC must be reduced to reflect the current situation (market and social forces). The volume harvested has not approached the AAC in recent years.
- the timber harvesting land base has been reduced by half, which suggests harvesting will be twice as intensive on land that is also high value habitat for some wildlife.

Several downward pressures on timber supply are identified. These include completion of the LRMP and uncertainty about fire losses, inventory volume estimates, productivity estimates and the effects of climate change.

Allocation

Several submissions say the majority or all of the AAC should go to small, value-added operators with a record in the area, in order to maximize local employment creation. Given all the uncertainties outlined in the *Analysis Report*, long-term forest tenures are not recommended.

Management Practices

One submission says the experience and science necessary to support industrial forestry in northern BC does not exist and the northbound continuation of current forest practices will have a significant and possibly devastating effect on the 'quality of life' of all creatures in the Cassiar TSA.

Skeena Cellulose says since there has been little harvesting in the Cassiar TSA, current management practices could be derived from nearby TSAs, especially the Bulkley TSA which is under the management direction of the same district office.

Cassiar Forest Watch recommends the Ministry of Forests assume or encourage a new direction in management that includes area–rather than volume-based management, more community ownership rather than capital ownership and ecosystem-based management.

Appendix 1

Submissions received by the Cassiar Forest District

Submissions received on the Data Package

First Nations

ShaKlink Family, Tahltan Nation, Dease Lake
Carcross/Tagish First Nation, Carcross YT
Teslin Tlingit Council, Teslin YT

Forest industry

Atlin mill operator
Skeena Cellulose Inc., Terrace

Interest groups

Canadian Parks and Wilderness Society, Yukon Chapter, Whitehorse YT
Cassiar Forest Watch
Friends of the Stikine, Smithers
Redfern Resources, Vancouver
Spatsizi Wilderness Vacations, Smithers
The Bike, Hike & paddle Co. (2 submissions)
Wolf Creek Lodge, Iskut

General public

6 individual submissions

Submissions received on the Timber Supply Analysis Report

First Nations

Tahltan Joint Councils – Land Use Office

Local government

Regional District of Kitimat-Stikine
Regional District of Kitimat-Stikine

Interest groups

BC Spaces for Nature
Cassiar Watch
Canadian Parks and Wilderness Society, BC chapter
Out-Yonder Productions

Consultants

RRL Recreation Resources Ltd.

General public

6 individual submissions